

REMARKS

The Office Action dated May 19, 2004 has been received and carefully considered. In this response, the specification, Figure 1 and claims 1, 2, 7, 9-20, 22-27, 29-37, 39, 40, 42 and 43 have been amended, claims 44-54 have been added and claims 3-6 and 8 have been canceled without prejudice. The amendments to the claims were made for grammatical purposes and are not intended to differentiate the claimed invention from the prior art. Support for the amendments to the specification, Figure 1 and claims 1, 2, 7, 9-20, 22-27, 29-37, 39, 40, 42 and 43 and the addition of new claims 44-54 may be found in the specification and figures as originally filed. No new matter is introduced by the amendments and the new claims. Reconsideration of the outstanding rejections in the present application therefore is respectfully requested based on the following remarks.

Objection to the Drawings

At page 2 of the Office Action, the drawings were objected to under 37 C.F.R. § 1.83(a) as purportedly not showing each and every feature specified in the claims. The Examiner specifies that “the prioritization method, the predefined selection method, and the plurality of compressors/encoders” allegedly could not be found. In the interest of advancing the present application, the Applicant has amended Figure 1 to illustrate a selection method 122 and a prioritization method 124 and has also amended the specification accordingly. However, none of the claims recite either of the terms “compressor” or “encoder,” much less “a plurality of compressors/encoders,” so it is respectfully submitted that it is unnecessary to show either of these features in the drawings at this time. Support for the amendments to Figure 1 may be found, *inter alia*, at page 5, lines 2-8 of the specification as originally filed and no new matter is introduced by the amendments to Figure 1 and the specification. Accordingly, the Applicant respectfully submits that the objection to the drawings is improper at this time and withdrawal of this objection therefore is respectfully requested.

Objection to Claims 13 and 26

At page 2 of the Office Action, claims 13 and 26 were objected to for various informalities. Claim 26 has been amended consistent with the Examiner's comments. With regard to claim 13, the Examiner appeared to not understand the use of the phrase "one-to-one correspondence" in claim 13. The Applicant respectfully submits that the use of the phrase "one-to-one correspondence" in claim 13 is consistent with its plain and ordinary meaning, *i.e.*, that each display stream of the first plurality of display streams corresponds to a respective display device of the first plurality of display devices, and vice versa. Accordingly, the Applicant respectfully submits that the objection to claim 13 and 26 is improper at this time and withdrawal of this objection therefore is respectfully requested.

Anticipation Rejection of Claims 1, 2, 42 and 43

At page 3 of the Office Action, claims 1, 2, 42 and 43 were rejected under 35 U.S.C. § 102(e) as being anticipated by Girod (U.S. Patent No. 6,480,541). This rejection is respectfully traversed.

Claims 1, 42, and 43 recite, in part, the limitations of determining if a predetermined criteria is met by a first representation of a display data, wherein the first representation of the display data *includes a first plurality of display streams* to be transmitted to a first plurality of display devices and compressing *a first display stream of the first plurality of display streams* when it is determined that the first representation of the display data does not meet the predetermined criteria. The Examiner asserts that Girod discloses at least these limitations and cites the passages at col. 1, lines 14-16, col. 7, line 50 – col. 8, line 18 of Girod in support of this assertion. Office Action, p. 3. Specifically, the Examiner asserts that "the first plurality of display streams is the video data coded at the first level The predetermined criteria or available bandwidth is determined for each channel. The display stream, or video, having the highest bit rate tolerable by the channel is then selected. . . . The system compresses the display stream or video and then selects one of the compressed streams based upon the available bandwidth of the channel." *Id.*

Contrary to the Examiner's assertions, it is respectfully submitted that Girod fails to disclose or suggest selecting a first display stream of a plurality of display streams and compressing the first display stream when it is determined that the first representation of the display data does not meet a predetermined criteria as recited in claims 1, 42 and 43. As a first issue, the cited passages of Girod fail to disclose a first representation of display data that includes a plurality of display streams as recited by claims 1, 42, 43. Instead, Girod only discloses the "coding and storage of the same video signal at a variety of different bit rates." *Girod*, col. 7, lines 41-43. Girod makes no mention of the "video signal" having a plurality of display streams. As a second issue, the cited passages of Girod fail to disclose or suggest compressing a first display stream of a plurality of data streams of the first representation. Instead, Girod discloses the encoding of the video signal (which the Examiner appears to equate to first representation of the display data) into different resolutions of quantization. Thus, if it is incorrectly assumed that the video signal of Girod comprises a plurality of display streams (which is not disclosed or suggested by Girod), Girod would teach compressing all of the display streams, rather than compressing a first display stream of the plurality of data streams as recited by claims 1, 42 and 43. Thus, claims 1, 42 and 43 recite a method, system and computer readable medium, respectively, whereby a first data stream of a plurality of data streams of a display data (i.e., *only a portion of the display data*) is compressed when a predetermined criteria is not met. Girod, in contrast, teaches *compressing the entire display data* (i.e., the "video signal" of Girod) to meet a transmission bandwidth criteria.

Accordingly, because Girod fails to disclose at least the limitations of a representation of display data that includes a plurality of data streams and the compression of a first data stream of the plurality of data streams when a predetermined criteria is not met as recited in claims 1, 42 and 43, it is respectfully submitted that the Office Action fails to establish that Girod discloses or suggests each and every limitation of claims 1, 42 and 43. Moreover, it is respectfully submitted that the Office Action fails to establish that Girod discloses or suggests each and every limitation of claim 2 at least by virtue of its dependency from claim 1.

In view of the foregoing, it is respectfully submitted that the anticipation rejection of claims 1, 2, 42 and 43 is improper at this time and withdrawal of this rejection therefore is respectfully requested.

Obviousness Rejection of Claims 3-12, 15-18, 22-26, 28, 30-32, 34-36 and 39-41

At page 4 of the Office Action, claims 3-12, 15-18, 22-26, 28, 30-32, 34-36 and 39-41 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Girod. This rejection is respectfully traversed.

As noted above, Girod fails to disclose or suggest each and every limitation of claim 1, from which claims 7, 9-12, 15-18, 22-26, 28 and 30-32 depend (claims 3-6 and 8 have been canceled). Accordingly, Girod fails to disclose or suggest each and every limitation of these claims at least by virtue of their dependency from claim 1. Moreover, these claims recite additional limitations neither disclosed nor suggested by the cited references. For example, claim 10 recites the limitations of determining if an actual transmission time of a frame of data for a first display stream of the plurality of display streams matches a first predicted transmission time. Contrary to the Examiner's assertions, Girod fails to disclose predicting a transmission time for a frame of data and determining whether this predicted time matches the actual transmission time as recited in claim 10. As another example, claim 26 recites the limitations of selecting the first display stream from the first plurality of display streams using a predefined selection method. With regard to these limitations, the Examiner asserts that "the predefined method [disclosed by Girod] is selecting the stream or video that uses the highest bit rate tolerable by the channel." Office Action, p. 6. However, it is respectfully submitted that Girod discloses selecting one of three *already compressed* video signals for transmission (i.e., selecting after the video signal is compressed), whereas claim 26 recites selecting the first display stream *to be compressed*. Additionally, as noted above, Girod fails to disclose or suggest a plurality of display streams, so Girod necessarily fails to disclose or suggest selecting the first display stream.

With regard to claims 34-36 and 39-41, these claims depend from claims 33 and 37, respectively. The Office Action fails to establish that claims 33 and 37 are obvious in view of Girod, so the Office Action necessarily fails to establish that claims 34-36 and 39-41 are obvious in view of Girod at least by virtue of their dependency from one of claims 33 or 37. These claims also recite additional limitations neither disclosed nor suggested by Girod.

Accordingly, it is respectfully submitted that the obviousness rejection of claims 3-12, 15-18, 22-26, 28, 30-32, 34-36 and 39-41 is improper at this time and withdrawal of this rejection therefore is respectfully requested.

Obviousness Rejection of Claims 13, 14 and 19-21

At page 7 of the Office Action, claims 13 and 14 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Girod in view of Norsworthy (U.S. Patent No. 6,144,402. At page 7 of the Office Action, claims 19-21 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Girod in view of Keren (U.S. Patent Application Publication No. 2001/0026591). These rejections are respectfully traversed.

As noted above, the Office Action fails to establish that Girod discloses at least the limitations of determining if a predetermined criteria is met by a first representation of a display data, wherein the first representation of the display data includes a first plurality of display streams to be transmitted to a first plurality of display devices and compressing, in a first manner, a first display stream of the first plurality of display streams when it is determined that the first representation of the display data does not meet the predetermined criteria as recited in claim 1, from which claims 13, 14 and 19-21 depend. The Office Action also fails to establish that either of Norsworthy or Keren disclose these limitations. Accordingly, the Applicant respectfully submits that the Office Action fails to establish that the proposed combinations of Girod, Norsworthy and Keren disclose each and every limitation of claims 13, 14 and 19-21 at least by virtue of their dependency from claim 1. Moreover, these claims recite additional limitations neither suggested nor disclosed by the cited references.

Accordingly, it is respectfully requested that the obviousness rejections of claims 13, 14 and 19-21 are improper at this time and withdrawal of these rejections therefore is respectfully requested.

Obviousness Rejection of Claims 27, 29, 33, 37 and 38

At page 9 of the Office Action, claims 27, 29, 33, 37 and 38 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Girod in view of Putzolu (U.S. Patent No. 6,584,509). This rejection is respectfully traversed.

Claim 1, from which claims 27 and 29 depend, recites, in part, the limitations of determining if a predetermined criteria is met by a first representation of a display data, wherein the first representation of the display data includes a first plurality of display streams to be transmitted to a first plurality of display devices and compressing a first display stream of the first plurality of display streams when it is determined that the first representation of the display data does not meet the predetermined criteria as recited in claim 1, from which claims 27 and 29 depend. Claim 33 recites, in part, the similar limitations of selecting a first stream of *a plurality of display streams* based on a prioritization method, selecting one of a plurality of compression methods to be applied to the first stream, and repeating each of the above steps until the step of determining indicates an actual transmit time is within a predetermined tolerance of the estimated transmit time. Claim 37, from which claim 38 depends, recites, in part, the similar limitations of determining, for *each multimedia channel of a plurality of multimedia channels of a multimedia data stream*, whether an actual transmission time for a multimedia channel matches a predicted transmission time within a predetermined tolerance, selecting, using a predefined selection method, a first multimedia channel, and reducing an amount of data to be transmitted associated with the first multimedia channel when it is determined that the actual transmission time of the first multimedia channel exceeds the predicted transmission time by an amount greater than the predetermined tolerance.

As similarly discussed with reference to claim 1, the Office Action fails to establish that Girod discloses or suggests at least the limitations of a plurality of display streams/multimedia channels, selecting one of the display stream/multimedia channels, and compressing/reducing data associated with the selected display stream/multimedia channel, as recited in claims 33 and 37. The Office Action fails to establish that Putzolu discloses or suggests at least these limitations. Accordingly, the Applicant respectfully submits that the Office Action fails to establish that the proposed combination of Girod and Putzolu discloses or suggests each and every limitation of claim 33 and 37. Likewise, the Office Action fails to establish that the proposed combination of Girod and Putzolu discloses or suggests each and every limitation of claims 27, 29 and 38 at least by virtue of their dependency from one of claims 1 or 37. Moreover, these claims recite additional limitations neither disclosed nor suggested by either of Girod or Putzolu.

Accordingly, it is respectfully submitted that the obviousness rejection of claims 27, 29, 33, 37 and 38 is improper at this time and withdrawal of this rejection therefore is respectfully requested.

Conclusion

In view of the foregoing, it is respectfully submitted that the present application is in condition for allowance and an early indication of the same is courteously solicited. The Examiner is respectfully requested to contact the undersigned by telephone at the below listed telephone number in order to expedite resolution of any issues and to expedite passage of the present application to issue, if any comments, questions, or suggestions arise in connection with the present application.

The Applicant does not believe that any additional fees are due, but if the Commissioner believes additional fees are due, the Commissioner is hereby authorized to charge any fees which may be required, or credit any overpayment, to Deposit Account Number 50-2469.

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Date

Respectfully submitted,



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